

Honorable Judge,

I am writing to respectfully bring to your attention serious concerns regarding the above-referenced case. I am the owner of Budkoin LLC, a small business currently facing a lawsuit alleging ADA website violations brought by Primitivo Robles, who claims to be legally blind.

Unfortunately, I was not properly served in this matter due to the fact that my business does not maintain a physical office capable of receiving service. As a result, I was unaware of the summons until just a few days ago and have since defaulted unintentionally. The plaintiff and their representation appear to have mistakenly assumed that the location of my pickup kiosk is my business's physical storefront.

After reading the Class Action Complaint, it became clear that there were several inaccurate and misleading statements made about how my business operates. During my review of this case, I also found that the plaintiff has filed numerous nearly identical lawsuits against other small businesses in a short period of time.

From the moment I became aware of the ADA compliance concerns on Monday, April 7, 2025, I took immediate action, and as of today, Wednesday, April 9, 2025, my website is now fully compliant. Since starting my business on April 20, 2024, I've always made every effort to remain in good standing and follow all necessary legal requirements.

All I ask is a fair opportunity to be heard. I respectfully ask the Court to consider dismissing this case or, at the very least, to set aside the default so that I can respond properly and defend my business in good faith.

Thank you for your time and understanding.

Sincerely,
Delano de Randamie
Owner, Budkoin LLC